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Date: February 24, 2015

To: Chair Cole and members of the Natural Resources Board

From: Rob Bohmann, WCC Chair

Subject: Board Order WM-11-13 public hearing request: affecting chapters NR 1, 10, 12, 13, 19, and 45 related to deer management, hunting, and implementation of the 2012 White-tailed Deer Trustee's Report

I'd like to thank you for this opportunity to testify today on behalf of the Wisconsin Conservation Congress. The Congress supports the majority of the permanent Deer Trustee Rule before you today; however, we must object to a few key items or areas.

1. The WCC strongly opposes the requirement that 2/3 of the counties in the zone approve the recommendation to implement any season framework or bag limit. This requirement stifles the ability of the County Deer Advisory Councils to manage their county's deer herd. I appreciate the concerns that county specific recommendations may result in a "checkerboard" effect and regulations or seasons may not be consistent from one county to the next. However, I think that past experience with complex CWD regulations has shown that deer hunters can figure out what the regulations are on the 40, 80, or 180 acres they are hunting in a specific county. While there may be a "learning curve" as with any new regulation, if we are truly going to give the County Deer Advisory Councils a chance to be successful, we must afford them the tools they feel they need to get the job done. At the January 31 training for CDAC chairs and alternates (WCC delegates), significant and recurring concern was evident over the proposed implementation of season framework options only after 2/3 of the counties zone-wide approved those recommendations. If the citizen input and recommendations of individual councils will be undermined by a few more counties in their region that perhaps have different goals for their deer herd, then the CDACs have lost their ability to effectively manage their herds; and the public, that is the driver for this process, will lose faith in it before it ever has a chance to succeed.

As established by Wisconsin State Statutes, the Wisconsin Conservation Congress is officially recognized as the only natural resources advisory body in the state where citizens elect delegates to represent their interests on natural resources issues on a local and statewide level to the Natural Resources Board and the Department of Natural Resources. Their mission is to represent the citizens of Wisconsin by working with the Natural Resources Board and the Department of Natural Resources to effectively manage Wisconsin's greatest asset, our abundant natural resources, for present and future generations to enjoy.

2. Regarding the statewide restriction on the harvest of white/albino deer; the WCC must reiterate our opposition to any special regulations for white or albino deer. The Deer Trustee Report never mentioned anything about the harvest of white/albino deer. This is an entirely separate issue, and again, it should not be lumped in as a part of this rule package. If anything, the harvest or prohibition of the harvest of white/albino deer should be a County Deer Advisory Council option and not imposed state or region wide.
3. The WCC does not support the DNR's establishing by order of the secretary that antlerless tags issued to junior deer hunting license buyers are not valid in units where the DNR has not established a quota allowing the harvest of antlerless deer. At a minimum, we'd request that this item be tabled by the board until the public has had the opportunity to properly vet this idea.

In addition to the above objections, the WCC would like to register our concern with the requirement that season the frameworks recommended by the CDAC and implemented by the department would remain in place for three years. I have been assured that these frameworks could be changed in less than three years for herd management purposes, but for those counties that need or want to have an antlerless only season, the prospect of the department expecting that to be a three year commitment will be unpalatable for most. Why not afford the CDACs the flexibility to create their seasons annually with the strong recommendation that they remain as consistent as possible? And under this proposed rule the holiday-hunt is a mandatory season in the southern farmland units. Why not make it an option for the CDACs to choose instead of having it imposed on them? This is supposed to be a citizen driven process done at the county level, but having requirements like these forced on CDACs makes the council members feel like they are not being given the tools or flexibility to accomplish their goals.

In closing, I'd like to thank DNR staff (Kevin Wallenfang, Bob Nack, Melinda Nelson, Tom Hauge, Bob Holsman, Ben Beardsmore, Chris Tall, and Charlie Netteshiem) for the excellent job they did in providing this and additional information and technical support at the January 31st all-day training for our CDAC chairs and alternates. I'd also like to thank Greg Kazmierski for his attendance at that training. I think that by attending, he was able to clearly hear the message of concern over options that constrain the flexibility needed for a county to effectively manage their herd, specifically the implementation of regulation upon recommendation of 2/3 of a zone versus the county's recommendation.

Again, thank you for this opportunity to testify.

Sincerely,



Rob Bohmann, Chair
Wisconsin Conservation Congress